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1 on Exhibit 6 pending prosecutions that you are not
2 working cooperatively with a county prosecutor?

3 MR. HUDSON: Same objection, same
4 instruction.

5 A. I think I will follow the advice of counsel on
6 that.

7 Q. (BY MR. DOLLING) Okay. So Subsection B of
8 402.028 as we were discussing uses the word deputize.

9 A. Yes.

10 Q. Does the OAG interpret Subsection B to allow
11 for a county prosecutor to issue a standing deputization
12 to an assistant attorney general? For example, could a
13 county prosecutor issue you, Jonathan white, a standing
14 deputization to prosecute all suspected election law
15 offenses in the county?

16 MR. HUDSON: Same objection, same
17 instruction. Additional objection as to form,
18 foundation, and incomplete hypothetical.

19 A. I don't have a position on that very specific
20 scenario to share. I can say that we have not entered
21 into one of those agreements historically.

22 Q. (BY MR. DOLLING) Thank you. That was my next
23 question.

24 A. I knew it was.

25 Q. So if we could turn back to Exhibit No. 5

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1 have been the same circumstances I described before as
2 it would have been a soft touch. It would have been a
3 request that we would not have pushed without agreement
4 of the district attorney. And at most it would have
5 been a reference to a code section, but never a
6 mandatory directive.

7 Q. Okay. And so I guess that means that the OAG
8 has never utilized this provision against a county
9 prosecutor's wishes?

10 A. Exactly. Not -- not used it per se, but it
11 could have been referenced with regards to a request.

12 Q. Okay.

13 A. It was not, you know, a directive or mandatory
14 in nature.

15 Q. Would the OAG ever use this authority if a
16 county prosecutor did not want to prosecute or assist
17 with the -- in the -- the prosecution?

18 MR. HUDSON: Object as to attorney/client
19 privilege, work product doctrine, investigative
20 privilege, similar processes privilege, to the extent
21 you can respond without encroaching on those privileges,
22 you may do. Otherwise I'm instructing you not to
23 answer.

24 A. I have no way of knowing if the attorney
25 general would ever use it. We have never used it in the

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1 past and as I previously testified here and before the
2 legislature is we always used a soft touch and a
3 cooperative approach with local prosecutors. We'd never
4 desired to step on a local prosecutor's toes or tried to
5 force them to do anything or be involved in anything
6 that they didn't want to be.

7 Q. (BY MR. DOLLING) Okay. Thank you. So handing
8 you what I've marked as Exhibit 8, which is a copy of
9 SB1 enrolled. Just confirm that for me.

10 (Exhibit No. 8 marked.)

11 A. Yes, sir.

12 MR. HUDSON: In the interest of short
13 circuiting out objections on the document itself as he's
14 asking questions. Can you verify where you got it from
15 and the reason I ask that is, is there's an actual
16 signed copy on the Secretary of States website. I don't
17 know if this is the final enrolled copy or not. Is
18 there any chance I can get you to clarify that?

19 Q. (BY MR. DOLLING) I cannot remember exactly
20 what the website is called, but it's the legislative
21 look up that's provided by the state on the capital
22 website or whatever it is.

23 MR. HUDSON: Thank you.

24 Q. (BY MR. DOLLING) So, Mr. White, do you
25 understand that when text is struck through it means

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1 as it exists now after the additions and removals. If
2 the registrar determines that a person who is not
3 eligible to vote registered to vote or voted in an
4 election, the registrar shall within 72 hours not
5 including weekends after making the determination
6 execute and deliver to the attorney general, the
7 Secretary of State, and the county or district attorney
8 having jurisdiction in the territory covered by the
9 election and affidavit stating the relevant facts; is
10 that correct?

11 A. Yes.

12 Q. Thank you. So would you agree that SB1 Section
13 2.04 added the requirement of a 72 hour turnaround on
14 the affidavit described in this section?

15 A. Yes, sir.

16 Q. And does the OAG agree that it added the
17 requirement that the registered -- registrar deliver
18 that affidavit to the OAG?

19 A. That is what the statute says. Yes, sir.

20 Q. And the requirement that the registrar deliver
21 that affidavit to the Secretary of State?

22 A. That is what the statute says, yes.

23 Q. What does the OAG interpret as the purpose of
24 these new requirements in the law?

25 MR. HUDSON: Objection; form. To the

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1 extent that that encroaches -- excuse me, objection
2 attorney/client privilege, attorney work product
3 doctrine, investigative privilege, as well as
4 legislative privilege, deliberative process privilege.
5 To the extent that you can answer without encroaching on
6 any of those privileges you're free to do so.
7 Otherwise, I'm gonna instruct you not answer.

8 A. I'll follow advice of counsel and also note
9 that that is not among the topics that I prepared to
10 deliver an opinion from the attorney general's office
11 on.

12 Q. (BY MR. DOLLING) What would you in your
13 personal capacity interpret as the purpose of these new
14 requirements?

15 MR. HUDSON: Same objection, same
16 instruction.

17 A. I would want to speculate as to legislative
18 intent behind this.

19 Q. (BY MR. DOLLING) Okay. Has the OAG received
20 any affidavits after the effective date of SB1 pursuant
21 to this amended election code Section 15.028?

22 A. Without getting into investigative privilege
23 and identifying specific details and specific
24 individuals who might have sent reports in. We have
25 received reports; although, I don't know what form they

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1 were in whether it was an affidavit or whether it was
2 just information.

3 Q. Would you characterize that information that
4 you received as pursuant to this section?

5 A. I don't really know for sure.

6 Q. Would the OAG use an affidavit if delivered to
7 the OAG pursuant to this amended election code section
8 as the basis for opening an investigation if it
9 reflected sufficient -- sufficiently credible
10 allegations?

11 MR. HUDSON: Same objection, same
12 instructions.

13 A. If we received a report from an elections
14 official regarding ineligible voting, we would accept
15 that for preliminary investigation and the determination
16 of whether to investigate fully.

17 Q. (BY MR. DOLLING) Has the OAG opened any
18 investigations on the basis of one of these affidavits?

19 MR. HUDSON: Same objection, same
20 instructions.

21 A. Without getting into any specific details
22 subject to privilege, we have opened investigations as a
23 result of information received from elections officials
24 regarding ineligible voting.

25 Q. (BY MR. DOLLING) Has the OAG Initiated any

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1 amendment?

2 A. I believe so. Yes.

3 Q. Thank you. Is it the OAG's understanding under
4 this pre SB1 version of Section 31.006 that the law
5 instructed the Secretary of State to refer complaints it
6 received to the OAG, but no other type of information?

7 MR. HUDSON: Object to the extent that that
8 will encroach on attorney/client privilege, work product
9 doctrine, investigative privilege, deliberative process
10 privilege. To the extent you can answer without
11 encroaching on those you're free to do so. Otherwise I
12 instruct you not to answer.

13 A. Well, I'm not prepared to deliver an
14 interpretation of the OAG on this specific provision.
15 My understanding of the statute as previously written
16 was silent as to what a complaint would entail. And so
17 the new language clarifies that other materials can be
18 provided.

19 Q. (BY MR. DOLLING) Prior -- under the prior
20 version of Section 31.006 when you receive referral --
21 when you would receive referrals from the Secretary of
22 State, were they -- was there like a formal complaint
23 document like a formal complaint form?

24 A. Yes. The Secretary of State has a formal
25 complaint form that's filled out by the complainant.

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1 A. Yes.

2 Q. And then it says the Secretary shall deliver to
3 the attorney general all pertinent documents and
4 information in the Secretary's possession and it adds
5 the words and information there; is that correct?

6 A. Yes.

7 Q. So does the OAG agree that these changes to
8 election code Section 31.006 broadened the universe of
9 information the Secretary of States office may consider
10 when making a referral to your office to include
11 information beyond what it could consider prior to the
12 changes?

13 MR. HUDSON: Object to the extent it calls
14 for attorney/client privilege, attorney work product,
15 investigative privilege. To the extent you can answer
16 without stepping on those privileges you may do so.
17 Otherwise, I'm gonna instruct you not to answer. Also
18 object to form, foundation, form; speculation.

19 A. I don't know of any official position the
20 attorney general has on whether that broadened the type
21 of information that we could receive from the Secretary
22 of State.

23 Q. (BY MR. DOLLING) Do you have an interpretation
24 in your personal capacity?

25 MR. HUDSON: Same objection, same

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1 instruction.

2 A. I don't know of any limitation that would have
3 prevented the Secretary of State from providing us other
4 information.

5 Q. Before --

6 A. Before SB1.

7 Q. Okay. Thank you. And so after the effective
8 date of SB1, have the referrals that you have received
9 from the SOS differed in any material way from the type,
10 I guess the format and type of information that you
11 received pre SB1 and post SB1, are there any material
12 differences?

13 A. None that I'm aware of.

14 Q. Thank you. Okay. Can we turn to SB1,
15 Section 5.15 which should be on Page 48? Right in the
16 middle.

17 A. Yes, sir.

18 Q. So I'm just going to read -- let me start by
19 saying Section 5.15 amended Section 87.0431B of the
20 election code; is that correct?

21 A. Yes, sir.

22 Q. And so I'm just going to read how the election
23 code existed before the changes. Subsection B, the
24 early voting clerk shall, not later than the thirtieth
25 day after election day deliver notice to the attorney

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1 general, including certified copies of the carrier
2 envelope and corresponding ballot application of any
3 ballot rejected because one, the voter was deceased,
4 two, the voter already voted in person in the same
5 election, three, the signatures on the carrier envelope
6 and ballot application were not executed by the same
7 person. Four, the carrier envelope certificate lacked a
8 witness signature, or five, the carrier envelope
9 certificate was improperly executed by an assistant; is
10 that a correct reading of how the law existed before
11 SB1?

12 A. Yes, sir.

13 Q. What is the purpose of these requirements under
14 section 87.0431B?

15 MR. HUDSON: Object based on the,
16 attorney/client, attorney work product, investigative
17 privilege, legislative privilege. With the extent you
18 can answer without encroaching on those privileges you
19 may do so. Otherwise I'm gonna instruct you not to
20 answer.

21 A. I wouldn't want to speculate as to what
22 legislative intent behind the statute has written.

23 Q. (BY MR. DOLLING) How often would the OAG
24 receive notices under election code 87.0431b prior to
25 the effective date of SB1?

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1 Q. Okay. Thank you. And now I just want to look
2 at how the SB1 amended this section and so, is it
3 accurate to say that basically SB1 added a 6th category
4 of circumstances in which the early voting clerk must
5 deliver notice to the attorney general and that category
6 is now Subsection 6 which reads, the early voting ballot
7 board or the signature verification committee determined
8 that another violation of the election code occurred?

9 A. Yes, sir.

10 Q. What does the OAG -- what is the purpose of
11 adding this Subsection?

12 MR. HUDSON: Object to the extent it calls
13 for attorney/client, attorney work product,
14 investigative or legislative privilege. To the extent
15 you can answer without encroaching on those privileges
16 you're free to do so. Otherwise, I instruct you not to
17 answer.

18 A. I wouldn't want to speculate as to the
19 legislative intent.

20 Q. (BY MR. DOLLING) Assuming that county
21 prosecutors would comply with these requirements, would
22 you expect to receive more notices under this amendment
23 than previous?

24 A. Adding additional category, I think logically
25 you could, you know, just on the basis of there being an

1 additional category you might logically expect that
2 there could be more referrals or not referrals, but
3 notices.

4 Q. Has the OAG received any notices pursuant to
5 this new Subsection after the effective date of SB1?

6 A. I'm not sure that we have.

7 Q. Okay. And so I guess you are unaware of any
8 investigations opened as a result of a notice under this
9 new Subsection?

10 A. That's correct.

11 Q. Same for prosecutions?

12 A. Yes.

13 Q. Okay. Thank you. And can we turn to SB1
14 Section 6.01 which is on Page 50, I think down at the
15 bottom. So Section 6.01 of SB1 amended Section 64.009
16 of the election code by adding or amending Subsection B
17 and adding Subsections E, F, F1, G, and H. Is that
18 correct?

19 A. Yes.

20 Q. And so I'd like to read Subsection F, which was
21 added by SB1 Section 6.01, and it reads, a person who
22 simultaneously assists 7 or more voters voting under
23 this section by providing the voters with transportation
24 to the polling place must complete and sign a form
25 provided by an election officer that contains the

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1 person's name and address and whether the person is
2 providing assistance solely under this section or under
3 both this Subsection and Subchapter B; is that correct?

4 A. Yes.

5 Q. And then Subsection G, a little bit under it
6 was added which reads, a form completed under Subsection
7 F shall be delivered to the Secretary of State as soon
8 as practicable. The Secretary shall retain a form
9 delivered under this section for the period for
10 preserving the precinct election records and shall make
11 the form available to the attorney general for
12 inspection upon request. Did I read that correctly?

13 A. Yes, sir.

14 Q. Do you know how long the period for preserving
15 the election precinct records is?

16 A. I believe it's a standard 22 months.

17 Q. Thank you. What does the OAG interpret as the
18 purpose of adding Subsection G, F and G.

19 MR. HUDSON: Object based on
20 attorney/client privilege, work product doctrine,
21 investigative privilege, legislative privilege. To the
22 extent you can answer that without encroaching on those
23 privileges you may do so. Otherwise, I will instruct
24 you not to answer.

25 A. I can't without speculating.

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1 Q. (BY MR. DOLLING) Since the effective date of
2 SB1, has the OAG made any request to inspect the forms
3 contemplated under Subsection G?

4 MR. HUDSON: Object to the extent that that
5 will encroach on attorney/client privilege, attorney
6 work product, investigative privilege. To the extent
7 you can answer without encroaching on those privileges
8 you're free to do so. Otherwise, I'm gonna instruct you
9 not to answer.

10 A. Not that I'm aware of.

11 Q. (BY MR. DOLLING) If you received a referral or
12 you -- if the OAG received a referral that implicated a
13 need to consult these records in the course of an
14 investigation, would the OAG utilize Subsection G to do
15 so?

16 MR. HUDSON: Objection; form. Foundation.
17 Objection; form. Speculation. Same instructions, same
18 objections concerning privilege.

19 A. Yeah, I wouldn't speculate as to what we would
20 do, but this is a potential tool that could be available
21 for investigative use if we received a complaint
22 regarding activity in an election that might have been
23 involved the completion of these forms.

24 Q. (BY MR. DOLLING) What sort of criminal
25 activity in a -- in an elect -- in connection with an

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1 A. Yes, sir.

2 Q. And it has -- at the end of it, it says hash
3 tag SB1; is that correct?

4 A. Yes, sir.

5 Q. And November 5th 2021 was after the passage of
6 SB1; is that correct?

7 A. That is correct.

8 Q. Does the statement that election integrity is
9 my number one priority reflect the policy of the OAG?

10 MR. HUDSON: Same objections.

11 A. I can't answer that.

12 Q. (BY MR. DOLLING) Okay. Do Attorney General
13 Paxton's tweets have any impact on the operations of the
14 Election Integrity Division?

15 A. What I can tell you is that this is my first
16 time to read these tweets.

17 Q. Okay. Do you know if anyone else in the
18 Election Integrity Division has read these tweets or is
19 aware of Attorney General Ken Paxton's statements?

20 MR. HUDSON: Objection; form. Foundation.
21 Objection; form. Speculation.

22 A. I don't know.

23 Q. (BY MR. DOLLING) Okay. Has Attorney General
24 Ken Paxton ever put pressure on the Election Integrity
25 Division to investigate more cases?

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1 MR. HUDSON: Objection to the extent that
2 it would encroach on deliberative process privilege,
3 attorney/client, attorney work product, investigating
4 privilege. I instruct you not to answer. To the extent
5 you can answer without encroaching on those privileges
6 you're free to do so. Also object to the form,
7 foundation. Form. Speculation.

8 A. I'll follow advice of counsel.

9 Q. (BY MR. DOLLING) Have you in your personal
10 capacity ever felt pressure from Attorney General Ken
11 Paxton to investigate more cases?

12 A. No.

13 Q. Okay. Same question for prosecuting more
14 cases.

15 A. Same answer.

16 Q. Okay. Has Attorney General Ken Paxton ever
17 overridden an assistant attorney general's decision not
18 to investigate an alleged offense under the election
19 code?

20 MR. HUDSON: Same objection, same
21 instructions.

22 A. Gonna follow the advice of counsel.

23 Q. (BY MR. DOLLING) Same question for prosecuting
24 an alleged offense.

25 MR. HUDSON: Same objection, same

1 instruction.

2 A. Follow the advice.

3 Q. (BY MR. DOLLING) Thank you. Okay. So if we
4 could just go back to the SB1 enrolled which is
5 Exhibit 8 and if we could just turn to Page 52.

6 MR. HUDSON: Just one thing before we go on
7 any further. So two things; one, I've got somebody
8 waiting for Topic 8. To the extent of the Topic 8
9 questions or are there more things coming?

10 MR. DOLLING: We could --

11 MR. HUDSON: And I'm only asking because I
12 got somebody waiting and so if you guys are gonna --

13 MS. OLSON: We can do it now. How long do
14 you think?

15 MR. DOLLING: I think it would just be a
16 few minutes really. If we could call that person in for
17 Topic 8 questions about the tweets --

18 MR. HUDSON: We don't have to do it right
19 this second. I just want to know if I can release him.
20 Yeah, I'm not trying to get in the way of your
21 deposition, I'm just trying to -- if you guys gonna do
22 the stuff with Jonathan then I'll let my other person go
23 'cause they're gonna be -- I hadn't planned to present
24 them toward the end, whenever you wrap with Jonathan.

25 MR. DOLLING: We'll just finish with

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1 our investigative team that's team oriented.

2 Q. Although you are the head of the Election
3 Integrity Division, there are officers in the hierarchy
4 of the OAG who are above you; is that correct?

5 A. Yes, we have an executive management team that
6 sets policy for the agency.

7 Q. Does anyone from that team ever countermand
8 decisions you make as head of Election Integrity
9 Division?

10 MR. HUDSON: Object based on the
11 attorney/client privilege, worked out prior to doctrine,
12 investigative privilege. To the extent that -- and
13 deliberative process privilege, to the extent you can
14 answer without encroaching on these privileges you're
15 free to do so. Otherwise, I direct you not to answer.

16 A. I don't think I can answer that without
17 discussing privileged material.

18 Q. (BY MR. DOLLING) Have you ever reversed a
19 policy or practice on the basis of someone else's
20 command?

21 MR. HUDSON: Same objection, same
22 instructions.

23 A. Same answer.

24 Q. (BY MR. DOLLING) Given the size of the
25 Election Integrity Division, would you say it's accurate

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1 to say that you are aware of all ongoing investigations
2 and prosecutions?

3 A. I'm generally aware of most investigations and
4 certainly as those investigations develop and they
5 encounter factual and legal issues, I've become more
6 informed of. So somewhere along the line I've become
7 aware of most investigations. Certainly all
8 investigations that lead to prosecutions and I'm at
9 least generally aware of all prosecutions.

10 Q. So would it be accurate to say that you are not
11 involved in all investigations, but you are involved in
12 all prosecutions?

13 A. That's probably fair to say. I generally get
14 involved from a standpoint of advice, legal analysis,
15 factual analysis, on investigations that reach a certain
16 point, but I think that's a pretty fair assessment.

17 Q. Are policies or practices ever set for the
18 Election Integrity Division without your input?

19 MR. HUDSON: Same objection, same
20 instructions.

21 A. I think I'll have to follow advice of counsel
22 on that.

23 Q. (BY MR. DOLLING) Okay. Now, if we can turn
24 back to Exhibit 8, which is SB1 enrolled please.

25 A. Yes, sir.

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1 Q. And if we could go to Page 52 which should have
2 Section 6.04 on it. So I'm just going to --
3 Section 6.04 amends election codes, Section 64.034; is
4 that correct?

5 A. Yes, sir.

6 Q. I'm just going to read how it exists after the
7 amendment. So Section 64.034 titled, Oath. A person
8 other than an election officer selected to provide
9 assistance to a voter must take the following oath,
10 administered by an election officer at the polling place
11 before providing assistance. I swear or affirm under
12 penalty of perjury that the voter I am assisting
13 represented to me they are eligible to receive
14 assistance. I will not suggest by word, sign, or
15 gesture how the voter should vote. I will confine my
16 assistance to reading the ballot to the voter, directing
17 the voter to read the ballot, marking the voter's ballot
18 or directing the voter to mark the ballot. I will
19 prepare the voter's ballot as the voter directs. I did
20 not pressure or coerce the voter into choosing me to
21 provide assistance. I am not the voter's employer, an
22 agent of the voter's employer or an officer or agent of
23 a labor union to which the voter belongs. I will not
24 communicate information about how the voter has voted to
25 another person and I understand that if assistance is

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1 provided to a voter who is not eligible for assistance
2 the voter's ballot may not be counted; is that correct?

3 A. Yes sir.

4 Q. What -- so I don't want to go back and read
5 specifically what was added, but we can see what was
6 added; is that correct?

7 A. Yes, sir.

8 Q. The underline --

9 A. Yes, we can.

10 Q. Does -- what does the OAG interpret as the
11 purpose of these new -- of this new language in SB1
12 Section 6.04?

13 MR. HUDSON: Objection, attorney/client
14 privilege, worked out, client investigative privilege,
15 legislative privilege. To the extent you can testify
16 without encroaching on those privileges you're free to
17 do so. Otherwise, I'm instructing you not to answer.

18 A. Yeah, I'm respecting privileges, I can't answer
19 without speculating.

20 Q. (BY MR. DOLLING) Okay. Would you -- would the
21 OAG agree that this amended language added the
22 potential for criminal liability into Section 64.034 by
23 adding the words, under penalty of perjury at the
24 beginning?

25 MR. HUDSON: Same objection, same

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1 instructions.

2 A. I didn't prepare to deliver an AG
3 interpretation of this specific provision.

4 Q. (BY MR. DOLLING) Okay.

5 A. But from my personal understanding of the law,
6 no, this -- the addition of under penalty of perjury
7 does not change or create an offense by -- Section 37.02
8 of the Penal Code always existed and this oath would
9 have applied as an oath required by law that would have
10 triggered a perjury offense had the other elements of
11 37.02 been met.

12 Q. Okay. In that case, would you agree that the
13 language that was added and removed changed the oath?

14 A. It did with the addition of language and the
15 subtraction of other language.

16 Q. So I guess I would ask, has the OAG
17 participated in any capacity in any investigation into
18 suspected offenses in connection with SB1 6.04 even if
19 like acknowledging that under your personal
20 interpretation the oath was subject to penalty of
21 perjury even pre SB1?

22 MR. HUDSON: Objection based on
23 attorney/client privilege, work product doctrine,
24 investigative privilege. To the extent that you can
25 respond without encroaching on those privileges you're

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1 free to do so. Otherwise, I instruct you not to answer.

2 A. Are you talking about investigations after SB1?

3 Q. (BY MR. DOLLING) Well, we can -- let's split
4 it up. So pre SB1, if this provision -- if the oath was
5 taken under penalty of perjury at that time, has -- had
6 your office participated in any capacity in any
7 investigations into perjury committed in connection with
8 this oath, the pre SB1 oath?

9 MR. HUDSON: Same objection, same
10 instructions.

11 A. I'm not aware of any perjury investigations or
12 result in prosecutions on this oath.

13 Q. (BY MR. DOLLING) Okay. Can we turn to Page 54
14 please? And that should be Section 6.06, starts at the
15 bottom there; is that right?

16 A. Yes, sir.

17 Q. And Section 6.06 amends Section 86.0105 of the
18 election code by amending Subsection A, C, and E, and
19 adding Subsection F; is that correct?

20 A. Yes, sir.

21 Q. And Subsection A now reads, A person commits an
22 offense if the person; one, compensates or offers to
23 compensate another person for assisting voters as
24 provided by a different section of the code, Section
25 86.010. And that's all I want to read for now. And

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1 then if we go down to Subsection E, it adds to
2 Subsection E and that reads, for purposes of this
3 section compensation means an economic benefit as
4 defined by Section 38.01 Penal Code.

5 A. Yes, sir. I see that.

6 Q. Do you interpret -- well, first of all, so
7 Section 6.06 added language to what constitutes an
8 offense under Section 86.01015 to create a new offense;
9 is that correct?

10 A. I don't know that I would say it creates a new
11 offense, but it modifies elements of an existing offense
12 under the code.

13 Q. Okay. And I just have a simple question for
14 this one which is, does the OAG interpret this offense
15 as having a mens rea?

16 MR. HUDSON: Object to the extent it will
17 call for attorney/client privilege, attorney work
18 product, investigative privilege. To the extent that
19 you can can respond to that without encroaching on those
20 privileges feel free to do so. Otherwise, I'm gonna
21 instruct you not to answer.

22 A. Could you repeat the part about mens rea?

23 Q. (BY MR. DOLLING) So as the -- the provision
24 I'm interested in, as it reads right now, Subsection A
25 of 86.0105 says, that a person commits an offense if the

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1 person compensates or offers to compensate another
2 person for assisting voters where under Subsection E,
3 compensation means an economic benefit as defined by
4 Section 38.01 Penal Code.

5 A. Got you.

6 Q. Would you read that offense -- would the OAG
7 interpret that offense as having a mens rea?

8 MR. HUDSON: Same objection, same
9 instructions.

10 A. Without having prepared to represent NAG's
11 interpretation -- EAG's interpretation or opinion on
12 this, I can tell you that whenever in a criminal law
13 there's not a specific mens rea established in the
14 statute it defaults to knowingly.

15 Q. (BY MR. DOLLING) Okay.

16 A. So the mens rea of this provision would be
17 knowingly.

18 MR. DOLLING: Okay. Thank you. I think at
19 this point if we can maybe take a five minute break?

20 MR. HUDSON: Sure. Off the record.

21 THE REPORTER: Off the record at 2:05 p.m.
22 (Recess.)

23 THE REPORTER: On the record at 2:19 p.m.

24 Q. (BY MR. DOLLING) Okay. Thank you for that
25 break. I just have a few more questions before I pass

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1 election fraud as an offense is typically a Class A
2 misdemeanor?

3 A. The base level offense is Class A misdemeanor,
4 yes.

5 Q. And that was true before SB1 and it's still
6 true after SB1.

7 A. Correct.

8 Q. Okay. So you, meaning Jonathan White,
9 testified before the House Election Committee in April
10 2021 about one of the predecessors to SB1 which was
11 House Bill 6 during the 87th regular session; is that
12 correct?

13 A. Sounds correct.

14 Q. At that time the House had been considering
15 heightening offenses under election code 276.013 from
16 Class A misdemeanors to second-degree felonies; is that
17 correct?

18 MR. HUDSON: Object to the -- based on
19 legislative privilege, attorney/client privilege,
20 attorney work product doctrine. To the extent that you
21 can testify without encroaching on those privileges
22 you're free to do so. Otherwise I instruct you not to
23 answer.

24 A. I'd like to stick to my testimony and I'm just
25 trying to recall what my testimony was and I hadn't had

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1 an opportunity to review that testimony, but I remember
2 I think remember being asked about that.

3 Q. (BY MR. DOLLING) Okay. Well, just for the
4 record, I'm gonna mark Exhibit No. -- I think we're on
5 10. This a copy of House Bill 6 that was being -- that
6 was at issue at the time of the testimony that we're
7 talking about April 2021. And I'm not sure exactly what
8 page it's on so let me see if I can find it. Somewhere
9 in here is House Bill 6's proposed changes to 276.01 --
10 here it is, it's on Page 17.

11 A. Got it.

12 Q. And so this is Section 5.04 of House Bill
13 No. 6, amended Sections 2 -- 276.013A and B election
14 code and Subsection B was amended to change the language
15 from an offense under this section is a Class A
16 misdemeanor to an offense under this section is a felony
17 of the second-degree. Do you see that on Page 18?

18 (Exhibit No. 10 marked.)

19 A. Yes, that was proposed in this bill and thank
20 you that helps refresh my memory.

21 Q. (BY MR. DOLLING) Thank you. Just to state the
22 question again, at -- at the time that you testified in
23 April 2021, the House had been considering heightening
24 offenses under Election Code 276.013 from Class A
25 misdemeanors to second-degree felonies, is that correct?

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1 A. It would have been the portion of deposition
2 Topic No. 1 that involved investigations, predicated on
3 suspected violation of SB1 sections.

4 Q. And what did you discuss with Lieutenant Rubio
5 in preparation for this deposition regarding that second
6 part of Topic No. 1?

7 MR. HUDSON: I'll object to the extent that
8 it will call for attorney/client privilege, work product
9 or an investigative privilege. To the extent that you
10 can respond to that without encroaching on those
11 privileges you're free to do so. Otherwise, I instruct
12 you not to answer.

13 A. I'll follow the advice of counsel.

14 Q. (BY MS. OLSON) What -- on what privilege are
15 you declining to answer that question?

16 A. With regard to investigative privilege,
17 primarily.

18 Q. All right. Are you relying on any other
19 privilege? Are there any things that you discussed with
20 Lieutenant Rubio that assisted you in preparing for your
21 deposition today that were not covered by the
22 investigative privilege?

23 A. I think if I could have a moment to discuss a
24 privilege issue with counsel, I can answer that
25 question.

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1 MS. OLSON: All right. I'm happy to take a
2 break we can go off the record.

3 THE REPORTER: All right. The time
4 2:31 p.m. and we are off the record.

5 (Recess.)

6 THE REPORTER: The time is 2:36 p.m. and we
7 are back on the record.

8 Q. (BY MS. OLSON) We're back the record and, Mr.
9 White, have you had an adequate opportunity to consult
10 with counsel regarding your privilege question?

11 A. Yes, ma'am. Thank you.

12 Q. And I think my question that was pending at the
13 time, was whether there was anything that you discussed
14 with Lieutenant Rubio that was not covered by the
15 investigative privilege?

16 A. Yes. I asked Lieutenant Rubio specifically
17 about whether we had investigations pending involving
18 violations that were novel to SB1.

19 Q. And did he answer your question?

20 A. Yes.

21 Q. And are there any such investigations pending?

22 A. No.

23 Q. And then you also met, you said with a person
24 named Conrad Swan who had something to do with budget?

25 A. Yes, ma'am.

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1 that a standard that is used when reviewing and a
2 complaint a standard that is used by the Election
3 Integrity Unit to determine whether or not it's going to
4 move forward on an investigation?

5 A. Not as such that's a very baseline standard.
6 We would have that standard in place because if an
7 offense -- if -- if a complaint does not actually allege
8 a criminal offense then we don't have any business with
9 it. So it would certainly have to meet that hurdle, but
10 that wouldn't necessarily make it a credible allegation.

11 Q. What aspects of a complaint or a referral would
12 the Election Integrity Unit rely on to assess whether
13 it's a credible investigation in practice?

14 MR. HUDSON: Object to the extent that it
15 will encroach on attorney/client privilege, attorney
16 work product, investigative privilege, including sources
17 and methods. To the extent you can respond without
18 encroaching on those privileges you're free to do so.
19 Otherwise, I'm gonna instruct you not to answer.

20 A. I'm not aware of any formalized factors that
21 are used in the evaluation of whether a complaint is
22 credible or not it's taken on a case by case basis and
23 fact by fact basis.

24 Q. (BY MS. OLSON) And who makes that initial
25 determination within the Election Integrity Unit about

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1 Q. So probable cause is the official legal
2 standard?

3 A. That is the official legal standard, yes.

4 Q. And -- but is it your offices practice, your
5 Election Integrity Division's practice only to charge a
6 case when it believes there's sufficient evidence to
7 convict a higher standard than probable cause?

8 MR. HUDSON: Objection; form. Foundation.
9 Objection. Asked and answered,.

10 Q. (BY MS. OLSON) You can answer.

11 A. Our practice is -- is generally to look for
12 cases that can actually be tried successfully and we
13 don't always know for sure whether --

14 Q. Right.

15 A. -- prosecution will be successful or not that's
16 the reason court exists. But yeah, we'll typically be
17 looking for a higher standard than simple probable
18 cause. We want successful cases.

19 Q. And does that mean you look at things about,
20 for example, whether certain evidence would be
21 admissible at a trial of the case?

22 MR. HUDSON: Object to the extent that
23 encroaching on attorney work product, attorney/client
24 privilege, or investigative privilege. To the extent
25 you can respond without encroaching on those privileges

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1 you're free to do so. Otherwise, I'll instruct you not
2 to answer.

3 Q. (BY MS. OLSON) And I'm not asking about any
4 particular case. I'm asking about what you do in
5 practice.

6 A. We would look at all legal and factual issues.

7 Q. Mr. White, I think you testified that you don't
8 keep track or don't keep statistics on how many
9 referrals that come to the Election Integrity Unit
10 results in investigations; is that right?

11 A. That's correct.

12 Q. Would there be a way to do that?

13 A. I think it would be possible to do that going
14 forward.

15 Q. So, for example, there -- there's a record
16 kept, I assume of your referrals that come into the
17 office?

18 A. Criminal Investigations keeps some record of
19 that.

20 Q. And when you say they keep some record of that,
21 what do you mean?

22 A. It's not very specific about the allegations.

23 Q. Do they keep a log of referrals if you know?

24 A. Something -- something like that.

25 Q. And when you say something like that, do you

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1 violation of the election code?

2 A. They don't have those numbers, no.

3 Q. What kinds of evidence typically do you look
4 for or do you find in a assistance fraud case?

5 MR. HUDSON: Object to the extent that it
6 encroach on attorney work product, attorney/client
7 privilege or investigative privilege. To the extent
8 that you can respond without encroaching on those
9 privileges, you may do so. Otherwise, I'm gonna
10 instruct you not to answer.

11 A. One thing we normally try not to do is to
12 discuss openly matter -- investigative methods.

13 Q. (BY MS. OLSON) So it was my -- I'm just
14 wondering what kind of evidence. So earlier in the
15 presentation you had all those examples or signs of ABBM
16 seeding fraud, the various documents, the mismatched
17 signatures. So that's evidence you might rely on in a
18 mail in ballot or voter harvesting, fraud prosecution,
19 correct?

20 A. Correct.

21 Q. Okay. So you discussed that publicly with the
22 election --

23 A. Understood.

24 Q. -- administrator. So what I'm asking you is
25 then for the assistance fraud, yeah I noticed there

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1 weren't really a lot of slides on assistance fraud, but
2 I'm wondering what kind of evidence? I'm not asking you
3 for any techniques, whether you use under covers or
4 anything like that or whether you are taping anybody or
5 I'm probably guessing not search warrants in that
6 situation, but I'm wondering what kinds of evidence do
7 you rely on to prove assistance fraud cases? And if you
8 can answer that even by referring to cases that have
9 moved through to conviction, what kind of evidence was
10 either referred to in a plea colloquy or was introduced
11 as evidence in court, that's fine.

12 A. Sure. Typically it will be a combination of
13 things, but it will rely heavily on testimony of the
14 victim. And let me point out again, that you know
15 there's not anything that we're doing that's scanning
16 and monitoring the state of Texas for assistance fraud,
17 that's not how it happens. We get a specific referral
18 of an allegation of criminal activity that we look into
19 at that point. That typically gives us some direction
20 as to what happened, where it happened, who was involved
21 in it, and then we can have investigators conduct
22 interviews and request applicable election records from
23 there. The other way that assistance fraud comes into
24 play is when we're investigating a mail ballot fraud
25 case and assistance fraud happens at the time that the

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1 vote harvester is actually -- has taken the voter's
2 ballot and purporting to help them fill out that ballot
3 or suggesting to the voter during the voting process how
4 that voter should vote. So there aren't like
5 physical -- as many physical documentary signs as we had
6 to give examples to the election officials about mail
7 ballot fraud, for example, that leaves more of a paper
8 trail.

9 Q. And prosecutors typically like to have
10 documents for a paper trail, correct?

11 A. Yes and no because documentary cases are a pain
12 to deal with, but yes.

13 Q. Documents say the same thing every time, right?

14 A. Theoretically, yeah, I think I agree with what
15 you're saying.

16 Q. And witnesses might change their testimony from
17 the time they're interviewed to the time they're in the
18 grand jury to the time they testify at trial, correct?

19 A. Certainly prefer to have a document than have
20 no document.

21 Q. And so with respect to assistance fraud, what
22 is the and I think this is what you told Mr. Dolling,
23 but please correct me if I'm wrong, which is why I have
24 to reask it, but the mens rea is knowing voter
25 assistance fraud?

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1 Q. (BY MS. OLSON) Does the Election Integrity
2 Division ever handle its own appeals?

3 A. Normally not.

4 Q. Who handles appeals from the Election Integrity
5 Division?

6 A. In individual cases our Criminal Appeals
7 Division will often step in to handle ordinary criminal
8 appeals. I have personally handled a few appeals, but
9 it's normally something that we hand off to a
10 specialized unit.

11 Q. Thinking of some responses to some questions
12 Mr. Dolling asked you. You asserted privilege or
13 followed Mr. Hudson's directions about a question where
14 he asked you if there were pending prosecutions that you
15 were not working cooperatively with a county prosecutor.
16 Do you recall that?

17 A. Yes, ma'am.

18 Q. And I just wanted to follow up on that a little
19 bit. So what -- what -- under what privilege were you
20 not answering that question?

21 A. To the extent that it involves discussions and
22 conversations between our office and a district attorney
23 with regard to a prosecution to a case. Could be work
24 product privilege it could be attorney/client privilege,
25 joint prosecution, doctoring may apply to that.

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1 Q. And so was the privilege being asserted to the
2 use of the word cooperatively?

3 A. The privilege would have been asserted in terms
4 of communications between the offices. I don't think I
5 was cuing in on a particular word in the question.

6 Q. And as I understood the question and maybe I
7 misunderstood so I'm gonna ask the question this way.
8 Are there pending prosecutions in which the Office of
9 the Attorney General's office is involved, but not
10 working with a county prosecutor or a district
11 attorney's office? So just the Office of the Attorney
12 General is handling?

13 A. I think I can answer that question generally.
14 That yes, we have cases that are pending based on the
15 Stephen's ruling whose outcome is tied to the Stephens'
16 decision.

17 Q. Okay. So those are cases in which only Office
18 of Attorney General personnel are assigned to the
19 prosecution, no county prosecutor personnel are assigned
20 to the prosecution; is that correct?

21 A. That's correct. We have cases where that's the
22 case.

23 Q. And they are being -- are they stay pending
24 motion for reconsideration?

25 A. Yes, ma'am, essentially.

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TEXAS
 SAN ANTONIO DIVISION

3 LA UNION DEL PUEBLO)
4 ENTERO, et al,)
)
5 Plaintiffs,)
) CIVIL ACTION
6 VS.)
) NO.: 5:21-cv-844-XR
7 STATE OF TEXAS, et al,)
) (Consolidated Cases)
8 Defendants.)
)

9
10 REPORTER'S CERTIFICATION

11 ORAL DEPOSITION OF JONATHAN WHITE

12 MAY 5, 2022

13
14 I, Miah Parson, CSR, Certified Shorthand Reporter
15 in and for the State of Texas, hereby certify to the
16 following:

17 That the witness, JONATHAN WHITE, was duly sworn by
18 the officer and that the transcript of the oral
19 deposition is a true record of the testimony given by
20 the witness;

21 I further certify that pursuant to FRCP Rule
22 30(f)(1) that the signature of the deponent:

23 X was requested by the deponent or a party before the
24 completion of the deposition and that the signature is
25 to be before any notary public and returned within 30

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1 days from the date of receipt of the transcript. If
2 returned, the attached Changes and Signature Page
3 contains any changes and the reasons therefor;

4 ____ was not requested by the deponent or a party
5 before the completion of the deposition.

6 I further certify that I am neither counsel for,
7 related to, nor employed by any of the parties or
8 attorneys in this action in which this proceeding was
9 taken, and further that I am *not* financially or
10 otherwise interested in the outcome of the action.

11 Certified to by me this 23rd day of May, 2022.

12
13
14
15 Miah Parson, CSR No. 11773
Expiration Date: 02/28/2023
Firm Registration No. 633
16 Magna Legal Services
16414 San Pedro, Suite 900
17 San Antonio, Texas 78232
Phone 210-697-3400
18 Fax 210-697-3408
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ELECTION CODE CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS



ELECTION CODE

TITLE 16. MISCELLANEOUS PROVISIONS

CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

SUBCHAPTER A. CRIMINAL INVESTIGATION

Sec. 273.001. INVESTIGATION OF CRIMINAL CONDUCT. (a) If two or more registered voters of the territory covered by an election present affidavits alleging criminal conduct in connection with the election to the county or district attorney having jurisdiction in that territory, the county or district attorney shall investigate the allegations. If the election covers territory in more than one county, the voters may present the affidavits to the attorney general, and the attorney general shall investigate the allegations.

(b) A district or county attorney having jurisdiction or the attorney general may conduct an investigation on the officer's own initiative to determine if criminal conduct occurred in connection with an election.

(c) On receipt of an affidavit under Section 15.028, the county or district attorney having jurisdiction and, if applicable, the attorney general shall investigate the matter.

(d) On referral of a complaint from the secretary of state under Section 31.006, the attorney general may investigate the allegations.

(e) Not later than the 30th day after the date on which a county or district attorney begins an investigation under this section, the county or district attorney shall deliver notice of the investigation to the secretary of state. The notice must include a statement that a criminal investigation is being conducted and the date on which the election that is the subject of the investigation was held. The secretary of state may disclose information relating to a criminal investigation received under this subsection only if the county or district attorney has disclosed the information or would be required by law to disclose the information.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1993, 73rd Leg., ch. 728, Sec. 78, eff. Sept. 1, 1993; Acts 1993, 73rd Leg., ch. 916, Sec. 26, eff. Sept. 1, 1993; Acts 2003, 78th Leg., ch. 1290, Sec. 1, eff. Sept. 1, 2003.

Sec. 273.002. LOCAL ASSISTANCE TO ATTORNEY GENERAL. For an election in which the attorney general is conducting an investigation, the attorney general may:

(1) direct the county or district attorney serving a county in the territory covered by the election to conduct or assist the attorney general in conducting the investigation; or

(2) direct the Department of Public Safety to assist in conducting the investigation.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.003. IMPOUNDING ELECTION RECORDS. (a) In the investigation of an election, a county or district attorney or the attorney general may have impounded for the investigation the election returns, voted ballots, signature roster, and other election records.

(b) To have election records impounded, the investigating officer must apply to a district court for an order placing the election records in the court's custody for examination by the officer.

(c) The application for impoundment must be filed with the district court of the county in which the election was held or an adjoining county. An application for records of a statewide election may be filed in the county in which the election was held, an adjoining county, or Travis County.

(d) On the filing of an application, the district judge shall issue an order impounding the records in a secure place under the terms and conditions the judge considers necessary to keep them under the judge's custody and control during the examination and for any additional time the judge directs.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 864, Sec. 254, eff. Sept. 1, 1997.

Sec. 273.004. EXAMINATION OF IMPOUNDED RECORDS. (a) The examination of impounded election records shall be conducted in the same manner as a court of inquiry.

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ELECTION CODE CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

(b) Impounded election records must be examined in the presence of the district judge ordering the impoundment or a grand jury, as provided by the judge's order.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

SUBCHAPTER B. PROSECUTION BY ATTORNEY GENERAL

Sec. 273.021. PROSECUTION BY ATTORNEY GENERAL AUTHORIZED. (a) The attorney general may prosecute a criminal offense prescribed by the election laws of this state.

(b) The attorney general may appear before a grand jury in connection with an offense the attorney general is authorized to prosecute under Subsection (a).

(c) The authority to prosecute prescribed by this subchapter does not affect the authority derived from other law to prosecute the same offenses.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1993, 73rd Leg., ch. 728, Sec. 79, eff. Sept. 1, 1993; Acts 1997, 75th Leg., ch. 864, Sec. 255, eff. Sept. 1, 1997.

Sec. 273.022. COOPERATION WITH LOCAL PROSECUTOR. The attorney general may direct the county or district attorney serving the county in which the offense is to be prosecuted to prosecute an offense that the attorney general is authorized to prosecute under Section 273.021 or to assist the attorney general in the prosecution.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.023. SUBPOENA. (a) A subpoena or subpoena duces tecum issued in connection with a prosecution under this subchapter is effective if served anywhere in this state.

(b) A witness may not be punished for failure to comply with a subpoena issued under this subchapter unless the proper fees are tendered to the witness as required by statute or court rule.

(c) The attorney general may direct the Department of Public Safety to serve a subpoena under this subchapter.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.024. VENUE. An offense under this subchapter may be prosecuted in the county in which the offense was committed or an adjoining county. If the offense is committed in connection with a statewide election, the offense may be prosecuted in the county in which the offense was committed, an adjoining county, or Travis County.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

SUBCHAPTER C. EXAMINATION OF BALLOTS BY GRAND JURY

Sec. 273.041. REQUEST TO EXAMINE BALLOTS. In the investigation of criminal conduct in connection with an election, a grand jury, on finding probable cause to believe an offense was committed, may request a district judge of the county served by the grand jury to order an examination of the voted ballots in the election.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, Sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

Sec. 273.042. ORDER BY DISTRICT JUDGE. On request of a grand jury for an examination of voted ballots, a district judge may order the custodian of the ballots and the custodian of the keys to the ballot boxes to deliver the ballot boxes and the keys to the grand jury.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, Sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

Sec. 273.043. CONDUCT OF EXAMINATION. The examination of ballots under this subchapter shall be conducted in secret before the grand jury.

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ELECTION CODE CHAPTER 273. CRIMINAL INVESTIGATION AND OTHER ENFORCEMENT PROCEEDINGS

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1997, 75th Leg., ch. 1078, Sec. 22, eff. Sept. 1, 1997; Acts 2003, 78th Leg., ch. 1315, Sec. 56, eff. Jan. 1, 2004.

SUBCHAPTER D. MANDAMUS BY APPELLATE COURT

Sec. 273.061. JURISDICTION. (a) The supreme court or a court of appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the holding of an election or a political party convention, regardless of whether the person responsible for performing the duty is a public officer.

(b) The court of criminal appeals may issue a writ of mandamus to compel the performance of any duty imposed by law in connection with the provision, sequestration, transfer, or impoundment of evidence in or records relating to a criminal investigation conducted under this code or conducted in connection with the conduct of an election or political party convention. If a writ of mandamus is issued under this subsection, it shall include an order requiring the provision, sequestration, transfer, or impoundment of the evidence or record.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Amended by:

Acts 2021, 87th Leg., 2nd C.S., Ch. 1 (S.B. 1), Sec. 8.04, eff. December 2, 2021.

Sec. 273.062. PROCEEDING TO OBTAIN WRIT. A proceeding to obtain a writ of mandamus under this subchapter shall be conducted in accordance with the rules pertaining to original proceedings of the court in which the petition is filed.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Sec. 273.063. VENUE IN COURT OF APPEALS. (a) A petition to a court of appeals for a writ of mandamus under this subchapter must be filed with the court specified by this section.

(b) A petition pertaining to an election must be filed with the court of the court of appeals district in which:

- (1) the respondent resides, or in which one of them resides if there is more than one respondent, if the election is statewide; or
- (2) the territory covered by the election is wholly or partly situated, if the election is not statewide.

(c) A petition pertaining to a political party convention must be filed with the court of the court of appeals district in which:

- (1) the respondent resides, or in which one of them resides if there is more than one respondent, for a state convention;
- (2) the territory represented by the convention delegates is wholly or partly situated, for a district convention; or
- (3) the precinct or county is situated, for a precinct or county convention.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986. Amended by Acts 1987, 70th Leg., ch. 54, Sec. 15(c), eff. Sept. 1, 1987.

SUBCHAPTER E. INJUNCTION

Sec. 273.081. INJUNCTION. A person who is being harmed or is in danger of being harmed by a violation or threatened violation of this code is entitled to appropriate injunctive relief to prevent the violation from continuing or occurring.

Acts 1985, 69th Leg., ch. 211, Sec. 1, eff. Jan. 1, 1986.

Office of the Attorney General of Texas
Election Fraud Violations
Prosecutions Resolved

Boe	Heide Kay Prince	Illegal Voting	2004 General Election	8-25-2101-CR-8	1	07/26/05	EC 64.012	Red guilty to 1 count attempted illegal voting, 2 years deferred adjudication, \$1500 fine and \$500 probation
Hardeman	Johnny Wayne Atkins	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Possession of an official ballot	2004 Primary Election	013449	6	11/04/05	EC 86.006	Red guilty to possession of official ballot or carrier envelope of another, 2 years probation, \$2500 fine
Nueces	Virginia Bernice Garcia	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Method of returning marked ballot, unlawful assistance	2005 School District Election	05-CR-9805-4	4	03/22/06	EC 86.006	1 year pre-trial diversion, 12 months community supervision
Nueces	Edda Garza Flores	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Method of returning marked ballot, unlawful assistance	2005 School District Election	06-CR-9805-4	1	03/22/06	EC 86.006	1 year pre-trial diversion, 12 months community supervision
Nueces	Isabel Luz Rios Gonzalez	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Method of returning marked ballot, unlawful assistance	2005 School District Election	05-CR-9809-3	2	03/22/06	EC 86.006	Red who conspires to 2 counts of possessing an official ballot or carrier envelope of another, 1 year deferred adjudication, \$500 fine, 12 months community supervision
Nueces	Josefine Marianna Suarez	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Method of returning marked ballot, unlawful assistance	2005 School District Election	06-CR-9807-1	1	03/09/06	EC 86.006	Red guilty to 1 count of illegally possessing an official carrier envelope of another, 1 year deferred adjudication, \$500 fine, 12 months community supervision
Reeves	Thina Velazquez	Vote Harvesting/Press Ballot Fraud - Method of returning marked ballot	2005 Primary Election	25-135	4	06/27/06	EC 86.006	Red guilty by way of 3 counts of possession of an official ballot or official carrier envelope of another, 10 days jail / probation for 6 months
Bowie	Willie Howard Ray	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Unlawfully obstructing watcher, unlawfully witnessing application for more than one application, unlawful assistance, security of ballots, ballot boxes and envelopes	2004 Primary Election	06M1309-CCL	7	07/17/06	EC 86.006	Red guilty to possession of an official ballot or official carrier envelope of another, 6 months deferred adjudication, \$200 fine, Original indictment dismissed.
Bowie	Jamillion Johnson	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud - Unlawfully obstructing watcher, unlawfully witnessing application for more than one application, unlawful assistance, security of ballots, ballot boxes and envelopes	2004 Primary Election	06M0302-CCL	2	07/17/06	EC 86.006	6 months deferred adjudication, \$200 fine
Soyke	Mafrids Hunter	Unlawfully obstructing watcher, unlawfully witnessing application for more than one application, unlawful assistance, security of ballots, ballot boxes and envelopes	2004 Primary Election	06M0301-CCL	2	07/17/06	EC 86.006	6 months pre-trial diversion
Nueces	Isabel Rios Flores	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud/Illegal Voting - Unlawful assistance, unlawfully influencing voter	2005 Primary Election	06-CR-23-65-B	2	06/04/06	EC 64.032	Red guilty to 2 counts illegal voting, 2 years deferred adj. probation, \$750 fine
Reeves	Antia Baza	Vote Harvesting/Mail Ballot Fraud - Method of returning	2004 Primary Election	25-136	5	08/23/06	EC 86.006	6 months pre-trial diversion

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Defendant	Charge	Election	Case No.	Counts	Date	Disposition
Harris	Illegal Voting - Impersonation of deceased voter	2008 Primary Election	1215818	1 count illegal voting (1) voter impersonation at polling place	10/04/09	Pled guilty to 1 count fraudulent use of identifying information, 1 year deferred adjudication, \$200 fine
Starr/Brooks	Illegal Voting - Felon	2007 Municipal and School Election	DS-04-09860 CR	2 counts illegal voting (1) ineligible voter felon	11/05/09	Pled guilty to illegal voting, 2 years TDCJ, \$500 fine
Starr/Brooks	Illegal Voting - Felon	2007 Municipal and School Election	DS-04-09861 CR	2 counts illegal voting (1) ineligible voter felon	11/05/09	Pled guilty to illegal voting, 30 years TDCJ, suspended, 4 years community supervision, \$500 fine
Starr/Brooks	Illegal Voting - Felon	2007 Municipal Election	DS-04-09862 CR	1 count illegal voting (1) ineligible voter felon	11/05/09	Pled guilty to 1 count of illegal voting, 5 years TDCJ
Parrish	Official Operation - Voting	2006 Special Election	2007-C-8153	2 counts of official operation	9/12/10	Dismissed indictment. Defense motion for collateral appeal denied.
Dimmick/Lasalle	Vote Harvesting/Mail Ballot Fraud	2006 Primary Election	DS-11-00652 CR	7 counts knowingly provide false information on an application for an early voting ballot	04/15/10	12 months pre-trial diversion, \$50 supervision fee, 80 hours of community service
Dimmick/Lasalle	Vote Harvesting/Mail Ballot Fraud	2006 Primary Election	DS-11-00653 CR	7 counts knowingly provide false information on an application for an early voting ballot	04/15/10	6 months pre-trial diversion, \$60 supervision fee
Jim Wells/Live Oak	Vote Harvesting/Mail Ballot Fraud	2008 Primary Election	20068	4 counts of method of returned marked ballot (less than 10)	06/24/10	Pled guilty to unlawful possession of ballot, 12 months probation, 180 days in jail (suspended), \$200 fine, 40 hours of community service
Jim Wells/Live Oak	Vote Harvesting/Mail Ballot Fraud	2008 Primary Election	20067	5 counts of method of returned marked ballot (less than 10)	06/24/10	Pled guilty to unlawful possession of ballot, 12 months probation, 180 days in jail (suspended), \$200 fine, 40 hours of community service
Jim Wells/Live Oak	Vote Harvesting/Mail Ballot Fraud	2008 Primary Election	20066	3 counts of method of returned marked ballot (less than 10)	06/24/10	Pled guilty to unlawful possession of ballot, 12 months probation, 180 days in jail (suspended), \$200 fine, 40 hours of community service
Hediger/Brooks	Illegal Voting - Felon, Bribery, and Official Misconduct	2006 School District Election	DS-09-10316 CR	1 count illegal voting (1) ineligible voter felon	06/17/10	Pled guilty, 8 years TDCJ-20 suspended for 8 years community supervision, \$500 fine
Starr	Vote Harvesting/Mail Ballot Fraud - Unlawful possession of 50 mail-in ballots by candidate	2010 Primary Election	CR-10-371	1 count of carrier envelope action by another person other than voter	05/22/10	Pled guilty, 6 months community supervision, 180 days in jail (suspended), \$500 fine
Starr/Brooks	Vote Harvesting/Mail Ballot Fraud - Providing fraudulent registration cards to vote	2006 Primary Election	DS-07-09768 CR	1 count of unlawful delivery of a certificate	09/15/10	Jury trial resulting in hung jury, dismissed
Hediger/Brooks	Illegal Voting - Felon, Bribery, and Official Misconduct	2008 School District Election	DS-09-10317 CR	1 count illegal voting (1) ineligible voter felon	11/20/10	Pled guilty, 2 years TDCJ-20
Davis/Live Oak	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud	2008 Primary Election	20068, 20081	1 count of unlawful assistance, 1 count of method of returned marked ballot	12/14/10	Pled guilty to possession of a ballot and unlawful assistance, and received 1 year deferred adjudication, and paid a \$1000 fine and court costs
Quail/Live Oak	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud	2008 Primary Election	20082, 20083	1 count of unlawful assistance, 1 count of method of returned marked ballot	12/14/10	Pre-trial diversion 6 months, \$1,500 donation to the county
Davis/Live Oak	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud	2008 Primary Election	20084, 20085, 20086, 20087, 20088, 20089, 20090, 20091	4 counts of unlawful assistance, 4 counts of method of returned marked ballot	12/14/10	Pled guilty to 4 counts of possession of a ballot and 4 counts of unlawful assistance, and received 1 year jail, probation for 12 months, and paid a \$1000 fine and court costs
Smith	Illegal Voting	2009 Municipal Election - Local	241-1682-11	1 count of illegal voting (1) ineligible voter	03/23/11	Pled guilty, received four years of deferred adjudication, a \$1,000 fine, and 100 hours of community service hours
Smith	Illegal Voting	2009 Municipal Election - Local	241-1682-11	1 count of illegal voting (1) ineligible voter	03/23/11	Plea bargain in 241-1682-11 for guilty plea to offense resulting in dismissal.
Seagr	Unlawfully accepting a voter, unlawfully permitting the deposit of a ballot, and illegal voting	2010 Primary Election	2010-W-0375	1 count of tampering of a governmental record	02/22/11	Pled guilty to one count of misdemeanor Tampering, 1 year probation
Dallas/Reynolds	Illegal Voting - Voter Impersonation	2010 Primary Election	11582011-CR-4	2 counts of attempted illegal voting (1) voter impersonation at polling place	05/16/11	Pled guilty to attempted illegal voting for impersonating a voter, 1 year probation, paid \$227 court costs.
Davis/Jin	Illegal Voting - Felon	2008 Primary Election	11-02-13251-CR	1 count of illegal voting (1) ineligible voter felon	08/31/11	Pled guilty for 2 years probation, 90 days in jail, and a \$2000 fine

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County	Defendant	Charge	Case Number	Election	Count	Date	Disposition
Hidalgo/ Bexar	Reyna Alvarez	Illegal voting	10-03-10342-CR	2009 School District Election	1 count of illegal voting - (3) voter impersonation	1	12/04/11 E.C. 64.012
Bexar	Mary Compton	Voter impersonation (voting for deceased voter still on voter rolls, while voting herself by mail ballot), benefits fraud (receiving SS benefits for herself and a deceased individual)	2011 CR 7939	2008 General Election	2 counts of illegal voting - voter impersonation	2	E.C. 64.012 (a) 3
Brewster	Shelia, Christine Thomas	Unlawfully Influencing Voter	11-05558-CR89-0013	2010 General Election	1 count of Unlawful Assistance	1	02/05/12 E.C. 64.012
Dallas/ Rockwall	Norma Ramirez	Aggravated perjury in connection with illegal voting		2010 Primary Election	4 counts of aggravated perjury	4	02/16/12 E.C. 64.012
Dallas/ Rockwall	Nadia Ramirez	Illegal Voting		2010 Primary Election	1 count of illegal voting - ineligible voter	1	02/16/12 E.C. 64.012
Dallas/ Rockwall	Nadia Ramirez	Illegal Voting		2010 Primary Election	3 counts of illegal voting - ineligible voter	3	02/16/12 E.C. 64.012
Dallas/ Rockwall	Nadia Ramirez	Illegal Voting		2010 Primary Election	3 counts of illegal voting - ineligible voter	3	02/16/12 E.C. 64.012
Dallas/ Rockwall	Carlos Medrano	Illegal Voting	2-11-418	2010 Primary Election	2 counts of illegal voting - ineligible voter	2	02/27/12 E.C. 64.012
Dallas/ Rockwall	Robert Edward Herrera	Illegal Voting	2-11-420	2010 Primary Election	3 counts of illegal voting - ineligible voter	3	02/16/12 E.C. 64.012
Dallas/ Rockwall	Roberto Herrera	Illegal Voting, aggravated perjury	2-11-416	2010 Primary Election	6 counts of aggravated perjury	6	02/27/12 E.C. 64.012
Dallas/ Rockwall	Patricia Martinez	Illegal Voting, aggravated perjury	2-11-108, 2-11-414	2010 Primary Election	1 count of illegal voting - ineligible voter, 5 counts of aggravated perjury	6	02/27/12 E.C. 64.012, P.C. 37.03
Dallas/ Rockwall	Gilda Hernandez	Vote harvesting/ Mail Ballot Fraud/Assurance Fraud - Influencing Voter	11002011-001-8	2010 Primary Election	an official ballot or envelope, 3 counts of unlawful assistance (influencing voter), 2 counts failure to provide identifying info while assisting voter	9	04/05/12 E.C. 64.012, P.C. 37.03
Hidalgo/ Bexar/ Henderson/ Smith	Janae De Jesus Castro	Illegal voting - Felony, bribery	09-09-32115 CR	2008 School District Election	1 count illegal voting - (1) ineligible voter felon	1	06/19/12 E.C. 64.012
Hidalgo/ Bexar	Frank Rosa	Illegal Voting	341-1402-11	2008 Municipal Election	1 count of illegal voting - (1) ineligible voter	1	06/19/12 E.C. 64.012
Hidalgo/ Bexar	Angel Trujillo	Illegal Voting - Felony	CR-1024-12-E	2010 Municipal and School District Election	3 counts illegal voting by unlawfully revealing information before polls	3	06/08/12 E.C. 64.012
Hidalgo/ Bexar	Baudilia Zapata	Unlawfully revealing information before the polls	12-03129	2008 Municipal Election	Unlawfully revealing information before polls	1	12/27/12 E.C. 64.012
Hidalgo/ Bexar	Sylvia Salas Vela	Illegal Voting	12-03119	2008 Municipal Election	Illegal voting	1	12/27/12 E.C. 64.012
Hidalgo/ Bexar	Salvador Vela	Felony in ballot selection	12-03128	2008 Municipal Election	Method of returning marked ballot	1	12/27/12 E.C. 64.012
Hidalgo/ Bexar	Remelinda Castillo	Illegal Voting - Felony	CR-1932-12-1	2010 General Election	1 count of illegal voting - (1) ineligible voter felon	1	01/17/13 E.C. 64.012
Compton	Margarita Rangel Cuza	Vote Harvesting/ Mail Ballot Fraud/Assurance Fraud: Influencing Voter	2013-DJS-00484	2010 Primary Election	1 count Unlawfully Assisting Voter	1	05/30/13 E.C. 64.010

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Ridgely/ Brooks	Loraine Antonio Almaraz	Illegal Voting - Voter Impersonation	2009 School District Election	10-03-0243-CR	2 counts of illegal voting - (3) voter impersonation at polling place	06/24/13	E.C. 64.012	Pled guilty to illegal voting - voter impersonation. Illegal voting - voter impersonation, sentenced to 2 years TDCJ on both counts, run concurrently, \$313 court costs.
Montgomery	James Alan Jenkins	Illegal Voting - Residency	2010 Special Election	12-03-025479-CR	1 count of illegal voting - ineligible voter	06/28/13	E.C. 64.012	Convicted during a jury trial, 1 count of illegal voting (1) ineligible voter, 3 years TDCJ, \$10,000 fine and \$354.00 in court costs reversed/reinstated by 14th CDA, pending new trial.
Montgomery	Peter Joseph Goodfellow	False statement on application, illegal voting	2010 Special Election	12-03-02531-CR	1 count of illegal voting - ineligible voter	07/12/13	E.C. 64.012	1 year Probation - Pre-trial Diversion Program
Montgomery	Adrian Hahn	False statement on application, illegal voting	2010 Special Election	12-03-025480-CR	1 count of illegal voting - ineligible voter	10/31/13	E.C. 64.012	Convicted during a jury trial, 1 count of illegal voting (1) ineligible voter, sentenced to 3 years TDCJ and \$10,000 fine, \$334.00 in court costs.
Montgomery	Sybil Lee Doyle	False statement on application, illegal voting	2010 Special Election	12-03-025337-CR	1 count of illegal voting - ineligible voter	04/02/14	E.C. 64.012	Convicted at jury trial, 1 count of illegal voting (1) ineligible voter, sentenced by deferred agreement, 3 years TDCJ, probation for 5 years, \$5,000 fine and \$359.00 in court costs.
Montgomery	Rebecca Margaret Cook	False statement on application, illegal voting	2010 Special Election	12-03-025415-CR	1 count of illegal voting - ineligible voter	04/02/14	E.C. 64.012	Convicted at bench trial, 1 count of illegal voting (1) ineligible voter, sentenced by deferred agreement, 3 years TDCJ, probation for 5 years, \$5,000 fine and \$359.00 in court costs.
Camerton	Garcia, Israel	Illegal Voting - Felon	2010 Municipal Election	2013-CR-00937	1 count of illegal voting - ineligible voter (felon)	06/18/13	E.C. 64.012	Pled guilty to illegal voting (felon) (felon voter) Class A misdemeanor, sentenced to 10 months confinement, 2 years probation, fine \$2500.
Montgomery	Name Removed	False statement on application, illegal voting	2010 Special Election	12-03-xxxx-CR	1 count of illegal voting - ineligible voter	05/15/14	E.C. 64.012	1 year Deferred Prosecution Probation. Eligible for expunction after serving 12 mos probation.
Montgomery	Whitney Harvett Benoit	False statement on application, illegal voting	2010 Special Election	12-03-02386-CR	1 count of illegal voting - ineligible voter	10/23/14	E.C. 64.012	3 years Deferred Adjudication, \$2,500.00 fine, \$334.00 in court costs.
Camerton	Tomasz Chwaz	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02977-A/14-CR-02984-A/14-CR-02985-A/14-CR-02987-A/14-CR-02989-A/14-CR-02991-A/14-CR-02993-A/14-CR-02995-A/14-CR-02996-A/14-CR-02997-A/14-CR-02999-A/14-CR-03003-A	3 counts - Carrier Envelope Action; Person Other than voter (Mid B); 3 counts - Assisting Voter Violation (Mid A); 3 counts - Harvest of Return Mail Ballot (Mid B); 4 count - Unlawful Assistance to voter (Mid A)	01/22/15	E.C. 86.0051 / E.C. 86.019 / E.C. 86.006 / E.C. 64.036	Pled guilty to unlawful assistance of voter, 6 month confinement, probation for 1 year of community supervision, fine \$250.
Jim Wells	Shirley Avenda Jr.	Illegal Voting - Felon	2012 Primary Election	14-07-1990-CR	1 count of illegal voting (1) ineligible voter (felon, 2nd Felony)	02/18/15	E.C. 64.012	Pled guilty to illegal voting (felon) sentenced to 10 years confinement, probation for 10 years of community supervision.
Jim Wells	Ruby Romero Almaraz	Illegal Voting - Felon	2012 Primary Election	14-07-13903-CR	1 count of illegal voting (1) ineligible voter (felon, 2nd Felony)	02/18/15	E.C. 64.012	Pled guilty to illegal voting (felon) sentenced to 10 years confinement, probation for 10 years of community supervision.
Ridgely	Jerik Luis Martinez	Unlawfully receiving ballot, illegal voting, and unlawfully assisting voter	2008 Municipal Election	CR-2632-09-B	12 counts of illegal voting	02/25/15	E.C. 64.012	Pled guilty to counts 1-6 for attempted illegal voting (Class A); 3 years community supervision.
Camerton	Paquida Garcia	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02980-A	1 Count - Unlawful Assistance to Voter (Mid)	03/19/15	E.C. 64.036	Supervision, Counts 7-12 were dismissed. Sentenced to 5 day confinement in county jail and \$450.00 fine.
Camerton	Carmina Garcia	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02978-A/14-CR-03010-011-CR-03011-A	1 Count - Carrier Envelope Action; Person Other than voter (Mid B); 1 Count - Method of Returning; Marked Ballot (Mid B); 1 count - Unlawful Assistance to Voter (Mid A)	04/08/15	E.C. 86.0051 / E.C. 86.005 / E.C. 64.036	1 year probation under diversion program (Deferred Pros.) for offense of unlawfully assisting voter.
Camerton	Rafael Angel Escondo	Vote Harvesting/Mail Ballot Fraud - Method of Returning Marked Ballot	2012 Primary Election Runoff	2015-CR-00269-0	1 Count - Method of Returning Marked Ballot more than 10 but less than 20 official ballots/carrier envelopes, (3rd Degree Felony)	06/12/15	E.C. 86.006	Pled no contest to Method of Returning Marked Ballot -10-20, (Class A), sentenced to three days in county jail, and taken into custody.

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Cameron	Jana Angel Garcia	Vote Harvesting/Mail Ballot Fraud - Method of Returning Marked Ballot	2012 Primary Election Runoff	14-CR-02981-B/14-CR-02985-B/14-CR-02990-B/14-CR-02992-B/14-CR-03994-B	3 counts - Method of Returning Marked Ballot Fewer than 10 official ballots/carrier envelopes 3 counts - Carrier Envelope Action: Person Other than Voter (Mid B) 3 counts - Method of Returning Marked Ballot (Mid B)	5	08/23/15	E.C. 86.006	Pled guilty to Method of Returning Marked Ballot <10 (Class B). Sentenced to two days county jail.
Cameron	Margarita Oquina	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02981-B/14-CR-02985-B/14-CR-02990-B/14-CR-02992-B/14-CR-03994-B	3 counts - Carrier Envelope Action: Person Other than Voter (Mid B) 3 counts - Method of Returning Marked Ballot (Mid B)	6	09/10/15	E.C. 86.0051 / E.C. 86.006	Pled guilty to Carrier Envelope Action by Person Other than Voter. Sentenced to 15 days county jail and \$250.00 fine/court cost.
Cameron	Yocelis Aguirre	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02981-B/14-CR-02985-B/14-CR-02990-B/14-CR-02992-B/14-CR-03994-B	1 count - Unlawful Assistance to Voter (Mid A) 1 count - Assisting Voter Violation (Mid A) 4 counts - Carrier Envelope Action: Person Other than Voter (Mid B) 4 counts - Method of Returning Marked Ballot (Mid B)	10	09/19/15	E.C. 86.0051 / E.C. 86.006	Pled guilty to Class A misdemeanor Unlawful Assistance of a Voter. 12 months of deferred adjudication, \$250 fine, and refraining from handling mail ballots and assisting voters.
Harris	Avery Ayers	Forgery/Tampering with petition for candidacy - forged signatures	2014 General Election	14-76757	1 Count of Tampering w/ a Governmental Record (SUF)	1	10/06/15	P.C. 32.21	Received a jury trial and pled guilty to one count of 3rd degree felony Forgery. Court convicted defendant and sentenced him to five (5) years TDCJ Institutional Division. No fine, court costs or restitution.
Cameron	Sarah Barabas	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2012 Primary Election Runoff	14-CR-02981-B/14-CR-02985-B/14-CR-02990-B/14-CR-02992-B/14-CR-03994-B	1 Count - Carrier Envelope Action: Person Other than Voter (Mid B) 1 Count - Method of Returning Marked Ballot (Mid B)	2	10/26/15	E.C. 86.006	Pled guilty to Class A misdemeanor Method of Returning Marked Ballot. Court sentenced her to one year of community supervision-deferred adjudication, plus a fine of \$150 and court costs. Defendant was ordered to refrain from assisting voters or other prohibited activity.
Edwards	Michael Scotch	Illegal voting (residency)	2013 Municipal Election 2014 Primary Election	6053	1 Count Illegal Voting (Municipal) 2 Counts of Tamper w/ a Gov't rec. 1 Count of Illegal Voting (Primary)	4	12/07/15	E.C. 64.012	Pled no contest to Count 1 of the Indictment - Illegal voting (ineligible voter-non resident) in a plea bargain agreement. State to dismiss counts 2, 3 & 4. Sentenced to 24 months of deferred adjudication community supervision, \$500 fine.
Edwards	Tamara South	Illegal voting (residency)	2013 Municipal Election 2014 Primary Election	6054	1 Count Illegal Voting (Municipal) 2 Counts of Tamper w/ a Gov't rec. 1 Count of Illegal Voting (Primary)	4	12/07/15	E.C. 64.012	Pled no contest to Counts 2 of the Indictment - Illegal voting (ineligible voter-non resident) in a plea bargain agreement. State to dismiss counts 2, 3 & 4. Sentenced to 24 months of deferred adjudication community supervision, \$500 fine.
Hidalgo	Guadalupe "Lupe" Rivera, Jr.	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2013 Municipal Election	CR-15-08765-B, CR-15-08766-B	1 Count Carrier Envelope Action: Person Other than Voter, 1 count Method of Returning Marked Ballot <10	2	07/11/16	E.C. 86.0051 / E.C. 86.006	Co-defendant accepted criminal responsibility for these offenses in plea resolving causes CR-15-08767-E, CR-15-08768-E, CR-15-08769-E, CR-15-08770-E, CR-15-08771-E, CR-15-08772-E, CR-15-08773-E, CR-15-08774-E, CR-15-08775-E, CR-15-08776-E, CR-15-08777-E, CR-15-08778-E, CR-15-08779-E, CR-15-08780-E, CR-15-08781-E, and CR-15-08782-E.
Hidalgo	Guadalupe "Lupe" Rivera, Jr.	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2013 Municipal Election	CR-15-08767-B, CR-15-08768-B, CR-15-08769-E, CR-15-08770-E, CR-15-08771-E, CR-15-08772-E, CR-15-08773-E, CR-15-08774-E, CR-15-08775-E, CR-15-08776-E, CR-15-08777-E, CR-15-08778-E, CR-15-08779-E, CR-15-08780-E, CR-15-08781-E, CR-15-08782-E	1 Count Unlawful Assistance to voter, 6 counts Carrier Envelope Action: Person Other than Voter, 6 counts Method of Returning Marked Ballot <10, 3 counts Assisting Voter Violation	16	07/11/16	E.C. 86.006	Pled guilty to Unlawful Assistance to a Voter, Class A misdemeanor. Sentenced to 365 days in jail, probation for one year of community supervision with a \$500 fine.

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Huebner	Graciela Sanchez	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud; Influencing Voter	2013 Municipal Election	CR-15-08761-B CR-15-08762-B CR-15-08763-B CR-15-08764-B	2 counts Corner Envelope Action; Person Other than Voter; 2 counts Method of Returning Marked Ballot; <10	4	07/11/18	E.C. 66.0051	Paid guilty to Corner Envelope Action. Person Other than Voter, Class 5 misdemeanor. Pre-trial diversion for a period of two years of community supervision, pay court and probation fees, complete 24 hours of community service. Other charges discussed.
Dallas Terrano	Rosa Maria Santiago	Illegal Voting - Non-Citizen	2012 General Election, 2014 Primary Run-off Election	1434155	2 counts of illegal voting - ineligible voter (non-citizen)	2	02/09/17	E.C. 64.012	Convicted by jury on both counts of illegal voting. Non-citizen. Jury sentenced her to a period of eight (8) years in the Texas Department of Criminal Justice Institutional Division on each count, sentences to run concurrently \$5,000.00 fine and \$325.00 in court costs.
Edwards	Manuel Rodriguez III	Illegal Voting - voter impersonation, illegal voting - ineligible voter (felon, unregistered voter)	2014 General Election	1730	2 counts of illegal voting, ineligible voter (felon, unregistered), voted as 99-year-old grandfather	2	2/27/2017	E.C. 64.012 (a) 1	Convicted of illegal voting (2nd deg. felony). Sentenced to two (2) years in the Texas Department of Criminal Justice Institutional Division.
Schmidt	Rita Renee Johnson	Illegal Voting - ineligible voter (non-resident)	Nov 2014 general election, May 2015 RISE election, May 2015 City of Rocksprings election, March 2016 primary election, May 2016 City of Rocksprings election, Nov 2016 General election, and May 2017 City of Rocksprings election	CR779096408	7 counts of illegal voting - ineligible voter (non-resident) - 2nd degree Felony	7	12/20/17	E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 7 counts illegal voting
Wells	Angel Antonio De Leon, Jr.	Illegal Voting; ineligible voter (convicted felon, on paper)	Special Runoff - CJA Dist 2 Runoff - 4/22/2016; Joint Primary Runoff - 5/24/2016; November 2016 General Election	CR826260117	4 counts of illegal voting - ineligible voter (felon) - 2nd degree Felony	4	01/29/18	E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 4 counts illegal voting
Webb	Aracelo Garcia Jr.	Illegal Voting; ineligible voter (convicted felon, on paper)	March 2016 Democratic primary, May 2016 Democratic runoff	CR6140380101	3 counts of illegal voting - ineligible voter (felon) - 2nd degree Felony	3	01/29/18	E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 3 counts illegal voting
Medina	Patricia Barton	Unlawfully Influenced Voter in Polling Place, Electioneering	Mar. 2018 Primary Election	CR4240437617	2 counts of unlawfully influencing voter in polling place, 1 count of unlawfully influencing voter in polling place	3	04/26/18	E.C. 61.008; E.C. 61.003	Prosecution Diversion Program - stipulation of guilt to 2 counts unlawfully influencing voter, 1 count electioneering
Hill	Aaron Torres	Unlawfully Revealing Information Before the Polls Closes	2018 Primary Runoff	CR7554393300	1 count of unlawfully revealing information before the polls close	1	05/03/18	E.C. 61.007	Prosecution Diversion Program - stipulation of guilt to 1 count unlawfully revealing information
Dallas	Shirley Brown	Unlawfully Accepting a Voter not eligible to vote, by election judge	2016 General Election	CR3852040670	3 counts unlawfully accepting a voter	3	05/31/18	E.C. 65.012	Prosecution Diversion Program - stipulation of guilt to 3 counts unlawfully accepting a voter
Kanedy	Chelside Olters	Illegal Voting; Election Fraud; False Statement on Registration Application	Mar. 2018 Primary Election	CR5920309473	Count 1 - illegal voting, 2nd degree felony; Count 2 - election fraud, CJA; Count 3 - false statement on a registration application, CJB	3	07/02/18	E.C. 64.012; 276.013; 13.007	Prosecution Diversion Program - stipulation of guilt to 1 count illegal voting, 1 count election fraud, and 1 count false statement on a registration application
Kanedy	Martin Oliveira	Illegal Voting; Election Fraud; False Statement on Registration Application	Mar. 2018 Primary Election	CR6880196392	Count 1 - illegal voting, 2nd degree felony; Count 2 - election fraud, CJA; Count 3 - false statement on a registration application, CJB	3	06/27/18	E.C. 64.012; 276.013; 13.007	Prosecution Diversion Program - stipulation of guilt to 1 count illegal voting, 1 count election fraud, and 1 count false statement on a registration application

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Kanney	Wendy Lauren Miller	Illegal Voting: Election Fraud; False Statement on Registration Application	Mar. 2016 Primary Election	CV4641286028	Count 1 - illegal voting, 2nd Degree Felony; Count 2 - election fraud, C.A.; Count 3 - false statement on a registration application, C.B.	3	06/05/18	E.C. 64.002; 278.013; 13.007	Prosecution Diversion Program - stipulation of guilt to 1 Count illegal voting, 2 Count election fraud, and 1 Count false statement on a registration application
Ruiz/San Pascual	Rosita Torres Flores	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud/Illegal Voting	November 2016 General Election	S-18-3685-02; 18-CR-03358	Count 1 - illegal voting, 2nd Degree Felony; Count 2 - method of returning marked ballot, S.F.; 1 Count misdemeanor unlawful assistance, C.A.	3	8/12/2018	E.C. 64.032; 86.006; 64.036	Convicted of unlawfully assisting/influencing voter with mail ballot (E.C. 64.036), 12 months jail, probation for 18 months, \$1000 fine, 10 days confinement in county jail served day for day as condition of probation
Frio	Consuelo Barralobos Castro	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud	2016 Primary Runoff Election	CV3729338414	2 Counts Unlawful Assistance, C.A.	2	6/15/2018	E.C. 64.036	Prosecution Diversion Program - stipulation of guilt to 2 Counts unlawful assistance to voters with their mail ballots
Frio	Maria Decarmen Vela	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud	2016 Primary Runoff Election	CV3729338414	6 Counts Unlawful Assistance	6	6/15/2018	E.C. 64.036	Prosecution Diversion Program - stipulation of guilt to 6 Counts unlawful assistance to voters with their mail ballots
Starr	Miguel Moreno	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	Mar. 2016 Primary Election	CV4341681207	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Vernice Flores Vega	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV3819749616	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Abigail Estrada	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV7915497228	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Dora Barrena	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV4781488382	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Rubia Marbella Flores	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV0192300090	1 Count Fraudulent Use of Application for Ballot by Mail, 2 Counts Illegal Voting	3	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 2 Counts Illegal Voting
Starr	Eusebio Lopez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV6201705016	1 Count Fraudulent Use of Application for Ballot by Mail, 1 Count Illegal Voting	2	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 1 Count Illegal Voting
Starr	Adriana Lopez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV1897927803	1 Count Fraudulent Use of Application for Ballot by Mail, 2 Counts Illegal Voting	3	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 2 Counts Illegal Voting
Starr	Alyssa Lopez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV6935550035	1 Count Fraudulent Use of Application for Ballot by Mail, 2 Counts Illegal Voting	3	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 2 Counts Illegal Voting
Starr	Zaida S. Nolasco	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV6665226046	1 Count Fraudulent Use of Application for Ballot by Mail, 2 Counts Illegal Voting	3	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 2 Count fraudulent use of application for ballot by mail and 2 Counts Illegal Voting
Starr	Jose Guadalupe Garcia	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV0976257516	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Andrea Hernandez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV5813948503	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Rodolfo A. Trevino	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV182309568	1 Count Fraudulent Use of Application for Ballot by Mail	1	6/25/2018	E.C. 64.0041	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail
Starr	Raul Louana Jr.	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV6361273586	1 Count Fraudulent Use of Application for Ballot by Mail, 1 Count Illegal Voting	2	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 1 Count Illegal Voting
Starr	Dayla Maria Garcia	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 Primary Election	CV2635106999	1 Count Fraudulent Use of Application for Ballot by Mail, 1 Count Illegal Voting	2	6/25/2018	E.C. 64.0041; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count fraudulent use of application for ballot by mail and 1 Count Illegal Voting
Kennedy	Larissa Sauer	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail	2016 March Democratic Primary Election	CV3041300477	1 Count False Statement on Application, 1 Count Illegal Voting	2	7/12/2018	E.C. 15.097; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False Statement on Application and 1 Count Illegal Voting

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Kennedy	Juan Vells	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Election Fraud	2018 March Democratic Primary	CX2940077562	1 Count False Statement on Application; 3 Counts Illegal Voting	4	7/17/2018	E.C. 13.007; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False Statement on Application and 3 Counts Illegal Voting
Kennedy	Leisha Munoz Vela	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Election Fraud	2018 March Democratic Primary	CX29255204507	1 Count False Statement on Application; 5 Counts Illegal Voting	6	7/17/2018	E.C. 13.007; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False Statement on Application and 5 Counts Illegal Voting
Scarr	Guadalupe Garza	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Election Fraud	2018 March Democratic Primary	CX6930944534	1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illegal Voting	6	7/25/2018	E.C. 13.007; E.C. 64.0041; P.C. 37.10; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illegal Voting
Scarr	Brandon Lee Garza	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Election Fraud	2018 March Democratic Primary	CX29255204507	1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illegal Voting	6	7/25/2018	E.C. 13.007; E.C. 64.0041; P.C. 37.10; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 1 Count Illegal Voting
Nunes/San	Cynthia Kay Gonzalez	Vote Harvesting/Mail Ballot Fraud/Assistance Fraud/Illegal voting	Robinson 2016 Primary Runoff	18-CR-831.09; 18-CR-831.10; 18-CR-831.11	Count 1 - carrier envelope action; SJP; Count 2 - method of returning SJP; Count 3 - assisting voter; SJP; and Count 4 - illegal voting; 2nd Degree Felony	4	8/14/2018	E.C. 26.0051; 96.006; 64.036; 64.012	Convicted of unlawful possession of a ballot (96.0051); carrier envelope action other than voter mail ballot (96.036); and unlawfully assisting voter with a mail ballot (96.010); sentenced to 180 days in jail, probation for 540 days, 180 days suspended for 540 days, and 365 days probation for 540 days and a \$500 fine, respectively. Sentenced to served 5 days county jail, day for day, as condition of probation.
Harris/Montgomery	David Jensen Garza Ana Angulo Yafira Zamora	Illegal Voting (non-citizen); Impersonation of a U.S. Citizen	2016 General Election	18-CR-06021; 18-CR-06022	Count 1 - illegal voting - near impersonation; Count 2 - illegal voting (non-citizen)	2	9/7/2018	E.C. 64.012	Convicted of both counts of illegal voting for impersonating a voter and voting when she was not eligible to vote (non-citizen). 10 years TDCJ, probation for 10 years, with 180 days in jail as condition, \$10,000 fine, probation for 10 years.
Scarr	Artemio Lopez	Vote Harvesting/Mail Ballot Fraud - Fraudulent Use of Application for Ballot by Mail; Election Fraud	2016 March Democratic Primary	CX8019112653	1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 3 Counts Illegal Voting	6	9/17/2018	E.C. 13.007; E.C. 84.0041; P.C. 37.10; E.C. 64.012	Prosecution Diversion Program - stipulation of guilt to 1 Count False statement on application; 2 Counts False information on application for ballot by mail; 2 Counts Tampering with a governmental record; 2 Counts Illegal Voting
Tarrant	Charles Jackson	False Statement on Application Mail Ballot Fraud/Vote Harvesting - Forged Voter's Signature	2016 Democratic Primary Election	18-CR-412	False Statement on Mail Ballot Application	1	4/6/2019	E.C. 84.0051	Convicted of False Statement on Mail Ballot Application; sentenced to 10 days county jail.
Polk	William Williams	Tampering with a Governmental Record; Illegal Voting (voting ballot of another); Election Fraud - Mail Ballot	2018 General Election	CX19765897267	2 Counts - Tampering with a Governmental Record; 2 Counts - Illegal Voting (voting mail ballot of another); 2 Counts - Election Fraud	6	5/5/2019	P.C. 37.10; E.C. 64.012; E.C. 276.013	Prosecution Diversion Program - stipulation of guilt to 2 Counts Tampering with a Governmental Record; 2 Counts Illegal Voting (voting ballot of another); 2 Counts Election Fraud
Scarr/Munoz	Seneca Garza	Illegal Voting/Mail Ballot Fraud Impersonation of deceased voter; Mail Ballot application Fraud; Mail ballot cast for voter who has died 9 years	2016 Democratic Primary Election	CX-0315-143	Counts 1-2 - illegal voting; Count 3 - False Statement on Mail Ballot Application	3	12/2/2019	E.C. 64.012; E.C. 64.0051	Sentenced for lack of evidence and in exchange for Defendant's cooperation with the State and an ongoing investigation by the Texas Rangers.
Harris	John Alsup	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election	CX8799402317	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	8/17/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation of the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud

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Harris	Betty Anderson	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election; 2019 Special Election; 2020 Primary	CX8794422517	1 Count - False Statement on Application; 3 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	5	8/14/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 3 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	James Core	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	5/19/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Michael Donello	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election	CX8794422517	1 Count - False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	4	8/12/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Name Removed	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election	CX8794422517	1 Count - False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	4	8/17/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Brian Mathew	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election; 2019 Primary Runoff	CX8794422517	1 Count - False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	5	8/14/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Micela Laker	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	8/19/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	David Levy	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	8/14/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Kyle Levy	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	8/14/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	Name Removed	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 Special Election	CX8794422517	1 Count - False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 2 Counts Election Fraud	6	8/11/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 2 Counts Illegal Voting; 1 Count Tampering with a Government Record; 2 Counts Election Fraud
Harris	Bernett Pitt	False Statement on Registration Application; Illegal Voting; Tampering with Government Record; Election Fraud - False Registration Address	2018 General Election	CX8794422517	1 Count - False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud	4	8/18/2020	E.C. 13.007; E.C. 64.012; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Illegal Voting; 1 Count Tampering with a Government Record; 1 Count Election Fraud
Harris	John Scott	False Statement on Registration Application; Tampering with Government Record; Election Fraud - False Registration Address	Voter Registration	CX8794422517	1 Count - False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud	3	8/15/2020	E.C. 13.007; P.C. 37.10; E.C. 276.013	Prosecution Diversion Program - stipulation to the commission of 1 Count False Statement on Application; 1 Count Tampering with a Government Record; 1 Count Election Fraud

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For a more complete understanding of the information on this page, please refer to the "Information on this page" section on the right side of the page.

County Sheriff/County Attorney/Prosecutor: For complete information, responses, and judgments and decisions, I understand all administrative requirements of the government of Maryland. I understand that this document is not a summary of all election violations in this state. This document does not record or report offenses handled exclusively by local law enforcement, district or county attorneys, or federal authorities. This document only reflects crimes investigated and/or prosecuted by the C&A.

Office of the Attorney General of Texas
Election Fraud Violations
Prosecutions Pending

Jefferson/ Chambers	Zena Collins Stephens	Bribery, unlawfully accepting a cash contribution (\$5,000/\$1,000), tampering with a campaign finance report	2016 General Election	180CR0152	Count 1 - tampering with an election record; Count 2 - unlawfully accepting a cash contribution; Count 3 - unlawfully accepting a cash contribution; Count 1 - unlawfully accepting a cash contribution; Count 2 - failure to return a political contribution	3	4/26/2018	P.C. 37.40; E.C. 253.033
Jefferson/ Chambers	Ray Elliott Beck	Bribery, unlawfully accepting a cash contribution	2016 General Election	180CR0153	Count 1 - unlawfully accepting a cash contribution; Count 2 - failure to return a political contribution	2	4/26/2018	E.C. 253.033; 254.034
Jefferson/ Chambers	Joseph Sterling Stevenson	Bribery, unlawfully accepting a cash contribution	2016 Democratic Primary Election	180CR0154	Unlawfully accepting a cash contribution	1	4/26/2018	E.C. 253.033
Hidalgo	Marceta Gutierrez	Unlawfully assisting/influencing voters; illegal voting	2016 City of Hidalgo Runoff Election	CR-18-08299-G; CR-18-08300-G; CR-18-08301-G; CR-18-08302-G; CR-18-08303-G; CR-18-08304-G; CR-18-08305-G; CR-18-08306-G; CR-18-08307-G	Misdemeanor cases 1-10 - Unlawfully Assisting/Influencing Voters; Felony count 1 - Illegal Voting	11	6/1/2018	E.C. 64.036; 64.012
Hidalgo	Sami Ornelas	Unlawfully assisting/influencing voters	2016 City of Hidalgo Runoff Election	CR-18-08296-A; CR-18-08297-A; CR-18-08170-A	Counts 1-3 - unlawfully assisting/influencing voters	3	5/31/2018	E.C. 64.036
Hidalgo	Sylvia Arjona	Unlawfully assisting/influencing voters	2016 City of Hidalgo Runoff Election	CR-18-08167-H; CR-18-08168-H; CR-18-08169-H; CR-18-08295-H	Counts 1-4 - unlawfully assisting/influencing voters	4	5/31/2018	E.C. 64.036
Tarrant	Letitia Sanchez	Illegal Voting - assisting another's ballot; Vote Harvesting/Mail Ballot Fraud; False Statement on Mail Ballot Application	2016 Democratic Primary Election	1565416	Count 1 - Illegal voting; Counts 2-17 - False Statement on Mail Ballot Application	17	10/10/2018	E.C. 64.036 (A); E.C. 64.0041
Tarrant	Letitia Sanchez Tapichin	False Statement on Mail Ballot Application; Vote Harvesting/Mail Ballot Fraud	2016 Democratic Primary Election	1565415	Counts 1-9 - False Statement on Mail Ballot Application	9	10/10/2018	E.C. 64.0041
Tarrant	Marie Rosa Solis	False Statement on Mail Ballot Application; Vote Harvesting/Mail Ballot Fraud	2016 Democratic Primary Election	1565413	Counts 1-2 - False Statement on Mail Ballot Application	2	10/10/2018	E.C. 64.0041
Tarrant	Laura Parra	False Statement on Mail Ballot Application; Vote Harvesting/Mail Ballot Fraud	2016 Democratic Primary Election	1565155	Counts 1 - False Statement on Mail Ballot Application	1	10/10/2018	E.C. 64.0041

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Prosecutions Pending

Navarro	Martinez Curry	Illegal Voting - Non-Citizen	2016 Presidential Election	D18883-CR	Illegal Voting	1	12/20/2018	E.C. 64.012
Harris	Anthony Rodriguez	Election Fraud - False Statement to Election Official	2018 General Election	1629438	Counts 1-2 - Election Fraud	2	4/26/2019	E.C. 276.011
Hidalgo	Ricardo Molina	Organized Election Fraud - Illegal Voting	2017 City of Edinburg Election	CR-2056-19-A	Count 1 - Engaging in Organized Election Fraud Counts 2-12 - Illegal Voting	12	6/6/2019	E.C. 276.011; E.C. 64.012
Hidalgo	Doris Molina	Organized Election Fraud - Illegal Voting	2017 City of Edinburg Election	CR-2057-19-A	Count 1 - Engaging in Organized Election Fraud Counts 2-3 - Illegal Voting	3	6/6/2019	E.C. 276.011; E.C. 64.012
Hidalgo	Jolo Carranza	Organized Election Fraud - Illegal Voting	2017 City of Edinburg Election	CR-2058-19-A	Count 1 - Engaging in Organized Election Fraud Counts 2-5 - Illegal Voting	3	6/6/2019	E.C. 276.011; E.C. 64.012
Hidalgo	Araceli Gutierrez	Organized Election Fraud - Illegal Voting	2017 City of Edinburg Election	CR-3349-19-A	Count 1 - Engaging in Organized Election Fraud Count 2 - Illegal Voting	2	8/22/2019	E.C. 276.011; E.C. 64.012
Hidalgo	Alyssa Cano	Illegal Voting	2017 City of Edinburg Election	CR-3347-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Balinda Rodriguez	Illegal Voting	2017 City of Edinburg Election	CR-3343-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Brenda Rodriguez	Illegal Voting	2017 City of Edinburg Election	CR-3344-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Crystal Lee Ponce	Illegal Voting	2017 City of Edinburg Election	CR-3341-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Cynthia Tamez	Illegal Voting	2017 City of Edinburg Election	CR-3339-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012

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Hidalgo	Daniel Castillo	Illegal Voting	2017 City of Edinburg Election	CR-3494-19-A	Illegal Voting	1	8/29/2019	E.C. 64.012
Hidalgo	Felisha Rodriguez	Illegal Voting	2017 City of Edinburg Election	CR-3346-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Francisco Torres, Jr.	Illegal Voting	2017 City of Edinburg Election	CR-3349-19-A	Counts 1-2 - Illegal Voting	2	8/22/2019	E.C. 64.012
Hidalgo	Guadalupe Garcia	Illegal Voting	2017 City of Edinburg Election	CR-3342-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	José Martinez	Illegal Voting	2017 City of Edinburg Election	CR-3347-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Jose Vela	Illegal Voting	2017 City of Edinburg Election	CR-3401-19-A	Illegal Voting	1	9/29/2019	E.C. 64.012
Hidalgo	Ludwina Leal	Illegal Voting	2017 City of Edinburg Election	CR-3492-19-A	Illegal Voting	1	8/29/2019	E.C. 64.012
Hidalgo	Mario Aleman	Illegal Voting	2017 City of Edinburg Election	CR-3338-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Rosendo Rodriguez	Illegal Voting	2017 City of Edinburg Election	CR-3345-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Ruby Torres	Illegal Voting	2017 City of Edinburg Election	CR-3340-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Hidalgo	Veronica Vela Saez	Illegal Voting	2017 City of Edinburg Election	CR-3337-19-A	Illegal Voting	1	8/22/2019	E.C. 64.012
Guadalupe	Sean "Stash" Boyle	Tampering with Government Record - Application for Candidacy - Follow-up Conviction/Ineligible for Office	2017 City of Cibola Election; 2019 City of Cibola Election	19-2108 CR-C; CCL-19-0809	1 count of Aggravated Perjury, 1 count of Tampering w/ Government Record with Intent to Defraud, 1 count of Tampering with a Government Record	3	9/5/19; 7/26/19	P.C. 37.03; P.C. 37.10
Limestone	Kelly Reagan Brunner	Voter Registration Fraud - Vote Harvesting	2020 Presidential Election	15126-A	67 counts Purportedly Acting as Agent (FS), 67 counts Election Fraud (SUF)	134	10/21/2020	E.C. 13.006; 276.013

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Election Fraud Violations
Prosecutions Pending

Medina/ Bandera	Eva Ann Montiel	Organized Election Fraud - Vote Harvesting	2018 Republican Primary	CR21-022	1 count Engaging in Organized Election Fraud (F1); 9 counts Illegal Voting (F2); 15 counts Unlawful Possession of Ballot/Ballot Envelope Enhanced (SIF); 3 counts Purportedly Acting as an Agent (F3); 5 counts Tampering w/ Government Document w/ Intent to Harm or Defraud (SIF); 14 counts Election Fraud Enhanced (SIF); 4 counts Fraudulent Use of Mail Ballot Application Enhanced (F3); 23 counts Unlawfully Assisting Voter Voting Ballot by Mail Enhanced (F3)	54	2/9/2021	E.C. 276.011; E.C. 64.012; E.C. 85.006; E.C. 85.006; P.C. 37.10; E.C. 276.013; E.C. 84.0041; E.C. 86.010
Medina/ Bandera	Lecor Rivas Garza	Organized Election Fraud - Vote Harvesting	2018 Republican Primary	CR21-019	1 count Engaging in Organized Election Fraud (F1); 2 counts Illegal Voting (F2); 8 counts of Unlawful Possession of Ballot/Ballot Envelope Enhanced (SIF); 2 counts Election Fraud Enhanced (SIF); 5 counts Fraudulent Use of Mail Ballot Application Enhanced (F3)	18	2/9/2021	E.C. 276.011; E.C. 64.012; E.C. 85.006; E.C. 276.013; E.C. 84.0042
Medina/ Bandera	Mary Jane Salderrano	Organized Election Fraud - Vote Harvesting	2018 Republican Primary	CR21-020	1 count Engaging in Organized Election Fraud (F1); 9 counts Illegal Voting (F2); 2 counts Unlawful Possession of Ballot/Ballot Envelope Enhanced (SIF); 1 count Fraudulent Use of Mail Ballot Application Enhanced (F3); 2 counts Unlawfully Assisting Voter Voting Ballot by Mail Enhanced (F3); 2 counts Tampering w/ Government Document with Intent to Harm or Defraud (SIF); 8 counts Election Fraud Enhanced (SIF)	25	2/9/2021	E.C. 276.011; E.C. 64.012; E.C. 85.006; P.C. 37.10; E.C. 276.013; E.C. 84.0041; E.C. 86.010
Medina/ Bandera	Tomas Ramirez	Organized Election Fraud - Vote Harvesting	2018 Republican Primary	CR21-021	1 count Engaging in Organized Election Fraud (F1); 17 counts Unlawful Possession of Ballot/Ballot Envelope Enhanced (SIF); 17 counts Unlawfully Assisting Voter Voting Ballot by Mail Enhanced (F3)	35	2/9/2021	E.C. 276.011; E.C. 86.006; E.C. 86.010
Victorio	Monica Mendez	Vote Harvesting; Assistance Fraud; Illegal Voting; Election Fraud	2018 Victoria County District Election	21-06-32996-A	3 counts Illegal Voting (F2); 8 counts Unlawful Possession of Ballot/Ballot Envelope Enhanced (SIF); 8 counts Election Fraud Enhanced (SIF)	26	7/15/2021	E.C. 64.012; E.C. 85.006; E.C. 86.010; E.C. 276.013
Bezar/ Kendall	Rachael "Rebeca" Rodriguez	Vote Harvesting; Assistance Fraud; Illegal Voting; Election Fraud	2020 Presidential Election	8231; 21-078-CR	1 count Illegal Voting (F2); 1 count Unlawful Possession of Ballot w/ Intent to Defraud, victim over 65 (SIF); 1 count Unlawful Assistance (CI A); 1 count Election Fraud (CI A)	4	3/1/2021	E.C. 64.012; E.C. 86.006; E.C. 64.036; E.C. 276.013
Harris/ Montgomery	Harris Earl Rogers	Vote Harvesting	2020 Primary Election; 2018 General and Special Elections	21-06-08901-CR	2 counts Illegal Voting (F2)	2	6/24/2021	E.C. 64.012

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Office of the Attorney General of Texas
Election Fraud Violations
Prosecutions Pending

Harris/ Montgomery ^a	Ignacio Gonzalez Bestman	Illegal Voting - Impersonation of a U.S. Citizen, Document Fraud, re'd by Diplomatic Security Services - U.S. State Dept.	Multiple Elections	21-05-08808	4 counts Illegal Voting (F2)	4	6/24/2021	E.C. 64.012
Noan ^a	Kenneth Ray Toar ^a	Fraudulent Use of Ballot Application, Decided Vote Impersonation, Tampering with Gov't Record	2020 Presidential Election	13853, 13854	1 count Fraudulent Use of Application for Ballot by Mail, enhanced (F2); 1 count Tampering with Gov't Record (50F)	2	8/17/2021	E.C. 84.0041, P.C. 37.10

Total Counts/ Offenses Pending Prosecution 410

Number of offenses related to cases involving:	Mail Ballot Fraud	287	70%
	Assistance Fraud	15	4%
	Illegal Voting	67	16%

^a County offense occurred/County offense prosecuted. ^b Investigated by local law enforcement and referred to OAG for prosecution | ^c Prosecuted by or with assistance of local district/county attorney.

This document is not a summary of all election violations in this state. This document does not record or report offenses handled exclusively by local law enforcement, district or county attorneys, and federal authorities. This document only reflects cases investigated and/or prosecuted by the OAG.

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